

**THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Emilienne S. Cadet	:	BK. No. 17-16606
Debtor.	:	Chapter No. 13
	:	11 U.S.C. §362
U.S. Bank Trust	:	
Movant,	:	
	:	
v.	:	
	:	
Emilienne S. Cadet and William C. Miller,	:	
Trustee,	:	
Respondents.		

**DEBTOR'S RESPONSE IN OPPOSITION TO MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

COMES NOW, Debtor by and through her duly authorized undersigned counsel,
and hereby respectfully represents as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied as a conclusion of law which no response is necessary.
8. Admitted.
9. Denied. Debtor believes there is adequate protection of this creditor's interest.
10. Denied. Debtor has made payments to lender. Debtor requests an updated payment history.
11. Denied as a conclusion of law to which no response is necessary.

1) Denied. Debtor believes there is adequate protection of this creditor's interest.

2) Denied as a conclusion of law which no response is necessary.

i. Denied.

ii. Denied.

12. Denied as a conclusion of law to which no response is necessary.

13. Denied as a conclusion of law to which no response is necessary.

WHEREFORE, Debtor respectfully request that this Court enter an Order denying Movant's Motion.

September 11, 2019

Law Offices of Georgette Miller, Esq., P.C.

By: /s/ Michelle Lee

Michelle Lee, Esq.

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